

# Exhibit “B”

UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF MASSACHUSETTS

FILE COPY

PAUL T. PAPADAKIS,  
Plaintiff,

v.

CSX TRANSPORTATION, INC.,  
Defendant.

C.A. No.: 04-30189-MAP

**DEFENDANT'S DISCLOSURE OF EXPERT WITNESS**  
**JOSEPH KENT, PURSUANT TO FED.R.CIV.P. 26(a)(2)**  
**AND LOCAL RULE 26.4(A)**

The defendant, CSX Transportation, Inc. ("CSX"), hereby submits the following Disclosure of expert witness Joseph Kent, pursuant to Fed.R.Civ.P. 26(a)(2) and Local Rule 26.4(A). Mr. Kent's *Curriculum Vitae*, List of Prior Cases in which Mr. Kent has testified or been deposed, a List of Publications, and his *Opinion Report* are attached hereto, and incorporated by reference. Mr. Kent is being compensated for his record review, inspection and report and testimony at a rate of \$295 per hour plus expenses.

Mr. Kent is a mechanical engineer and consultant. His opinions will be based on his education, training and experience as a mechanical engineer and consultant, his review of documents as listed in his report, and his inspection of the hi-rail device, all of which is more fully set forth in his *Curriculum Vitae* and *Report*.

The defendant reserves the right to supplement/amend this *Disclosure* prior to trial.


CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing pleading on all parties by hand/mail delivering same, to all counsel of record.

Signed under the pains and penalties of perjury.

DATED 12/2/02

Respectfully submitted,  
CSX TRANSPORTATION, INC.,  
By their attorneys,



Michael B. Flynn, BBO# 559023  
Valerie A. Murphy, BBO#661463  
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Dated: December 2, 2005

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## KENT ENGINEERING

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Marietta, Georgia 30068-2778  
770-565-0595

Joe W. Kent, P.E.

Mailing Address:  
P.O. Box 71535  
Marietta, GA 30007-1535

### Curriculum Vitae of JOE W. KENT, P.E.

#### Expertise

Consultant in the areas of vehicle dynamics, accident reconstruction, vehicle and heavy equipment fire and failure analysis, and machinery design.

#### Education

Bachelor of Science - Mechanical Engineering - North Carolina State University  
Master of Science - Mechanical Engineering - North Carolina State University

#### Experience

As the Principal of KENT ENGINEERING, formerly as a Partner in Kent, Vadnais & Wood and formerly as Project Engineer for Systems Engineering Associates, on behalf of manufacturers, insurance companies, and law firms, has: reconstructed vehicle accidents; analyzed vehicle wheels, brakes, steering, suspensions, engines, and drivetrains; determined origin and cause of vehicle and heavy equipment fires and explosions.

As a Senior Dynamics Engineer for Lockheed Aircraft Corporation, performed computer simulation and flight testing of the takeoff, landing, and taxiing characteristics of transport aircraft; designed and installed hydraulic, pneumatic, and electronic test equipment; analyzed structural aircraft components to predict and determine cause of failure.

As an Advanced Research Engineer for B.F. Goodrich, performed vehicle dynamics and tire dynamics research; analyzed prototype vehicle designs; developed mathematical and computer simulations of vehicle behavior; developed and performed extensive tire and vehicle handling tests, including test driving; designed tire test machinery; performed troubleshooting and redesigning of manufacturing equipment; provided technical support to the road racing program.

#### Memberships

Society of Automotive Engineers (SAE)  
Accident Investigation Practices Subcommittee  
Former Liaison Officer between Vehicle Dynamics Committee and Accident Investigation Practices Subcommittee  
Vehicle Dynamics Committee  
American Society of Mechanical Engineers (ASME)  
American Welding Society (AWS)

#### Publications

Proprietary publications for B.F. Goodrich regarding vehicle dynamics, torque steer, suspension alignment and tire dynamics.

Classified publications for Lockheed Aircraft Corporation regarding aircraft taxi dynamics.